

TABLE OF CONTENTS

Underground Injection Control Permit Number MT _____

PART I. GENERAL PERMIT CONDITIONS

Page

A. Effect of Permit.....	
B. Permit Actions.....	
C. Severability.....	
D. General Duties and Requirements.....	
1. Duty to Comply.....	
2. Need to Halt or Reduce Activity not a Defense.....	
3. Duty to Mitigate.....	
4. Proper Operation and Maintenance.....	
5. Duty to Provide Information.....	
6. Inspection and Entry.....	
7. Records.....	
8. Signatory Requirements.....	
9. Reporting Requirements.....	

PART II. SPECIFIC PERMIT CONDITIONS

E. Schedule for Compliance.....	
10. Monitoring Device.....	
11. Time for Compliance.....	
F. Corrective Action.....	
G. Well Operating and Monitoring Requirements.....	
12. Mechanical Integrity.....	
13. Injection Interval.....	
14. Injection Pressure Limitation.....	
15. Injection Volume Limitation.....	
16. Monitoring Requirements.....	
H. Plugging and Abandonment.....	
17. Notice of Plugging and Abandonment.....	
18. Plugging and Abandonment Plan.....	
19. Plugging and Abandonment Report.....	
I. Financial Responsibility.....	
20. Financial Responsibility.....	
21. Insolvency of Financial Institution.....	

where is it
Statement of Basis..... Not a part of PERMIT, ~~as~~ IT'S PART OF ADW. RECORDS
Attachment A (Plugging and Abandonment Plan).....

CONSTRUCTION REQUIREMENTS?

PART I. GENERAL PERMIT CONDITIONS

A. EFFECT OF PERMIT

The permittee is allowed to engage in underground injection in accordance with the conditions of this permit. The underground injection activity, otherwise authorized by this permit or rule, ~~shall~~ ^{may} not allow the movement of fluid containing any contaminant into underground sources of drinking water, if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 CFR Part 142 or otherwise adversely affect the health of persons. Any underground injection activity not authorized in this permit or otherwise authorized by permit or rule is prohibited. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. (Compliance with the terms of this permit does not constitute a defense to any action brought under Section 1431 of the Safe Drinking Water Act (SDWA) or any other law governing protection of public health or the environment for any imminent and substantial endangerment to human health, or the environment.) - May want to point out that the shield provision (40 CFR §122.35) DOES NOT APPLY TO THIS CLASS II PERMIT.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR Sections 144.39, 144.40, and 144.41. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

D. GENERAL DUTIES AND REQUIREMENTS

1. Duty to Comply. The permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of SDWA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.

2. Need to Halt or Reduce Activity not a Defense. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Duty to Mitigate. The permittees shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

4. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

5. Duty to Provide Information. The permittee shall furnish the Regional Administrator, within a time specified, any information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

6. Inspection and Entry. The permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

(a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by SDWA any substances or parameters at any location.

7. Records.

(a) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit for a period of at least five (5) years from the date of the sample, measurement or report. The permittee shall maintain records of all data required to complete the permit application and any supplemental information submitted for a period of three (3) years from the effective date of the permit. These periods may be extended by request of the Regional Administrator at any time.

(b) The permittee shall retain records concerning the nature and composition of all injected fluids until three (3) years after the completion of plugging and abandonment in accordance with the plugging and abandonment plan, Attachment A. The permittee shall continue to retain the records after the three year retention period unless he delivers the records to the Regional Administrator or obtains written approval from the Regional Administrator to discard the records.

This has been changed. See 144.51 (ix).

(c) Records of monitoring information shall include:

- (i) The date, exact place, the time of sampling or measurements;
- (ii) The individual(s) who performed the sampling or measurements;
- (iii) The date(s) analyses were performed;
- ⑥ → (iv) The exact method(s) used to take samples
- (v) The individual(s) who performed the analyses;
- (vi) The analytical techniques/methods and types of lab procedures used; and
- (vii) The results of such analyses.

8. Signatory Requirements. All reports or other information requested by the Regional Administrator shall be signed and certified according to 40 CFR 144.32.

9. Reporting Requirements.

(a) PLANNED CHANGES. The permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

(b) ANTICIPATED NONCOMPLIANCE. The permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

(c) TRANSFERS. This permit is not transferrable to any person except after notice is sent to the Regional Administrator and the requirements of 40 CFR 144.38 are complied with. The Regional Administrator may require modification or revocation of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under SDWA.

(d) COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 30 days following each schedule date.

(e) TWENTY-FOUR HOUR REPORTING.

(i) The permittee shall report to the Regional Administrator any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. The following shall be included as information which must be reported orally within 24 hours:

(a) Any monitoring or other information which indicates that any contaminant may cause endangerment to an underground source of drinking water.

(b) Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.

(ii) A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

(f) OTHER NONCOMPLIANCE. The permittee shall report all other instances of noncompliance not otherwise reported at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition 9 (e)(ii).

(g) OTHER INFORMATION. Where the permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the permittee shall submit such facts or information within 2 weeks of the time such information became known to him.

(h) ANNUAL REPORT. The permittee shall submit an annual report to the Regional Administrator summarizing the results of the monitoring required by permit condition 12.46. Such report shall include monthly records on injected fluids, and any major changes in characteristics or sources of injected fluid. The annual report shall cover the period of January 1 - December 31 and shall be submitted by February 15 each year.

31

ok the following

PART II. SPECIFIC PERMIT CONDITIONS

E. SCHEDULE FOR COMPLIANCE

10. Monitoring Device. The operator shall provide a one-half (1/2) inch iron pipe size (IPS) female fitting, with cut-off valve, to the tubing so that the amount of the injection pressure being used may be measured by the Regional Administrator or his/her representative by attaching a gauge having a one-half (1/2) inch male fitting. The identical device shall be installed on the tubing/casing annulus. All fittings will be maintained in good operating condition.

11. Time for Compliance. Compliance must be obtained within 3 months of the effective date of the permit.

F. CORRECTIVE ACTION

If at any time it is discovered that injection activities have caused fluid migration through any well bore within the area of review, or there are allegations or suspicions that injection activities have caused fluid migration through any well bore outside the area of review, the permittee shall notify the Regional Administrator as specified in Condition 9(e). In addition, the permittee shall halt injection activities immediately and take such corrective action as prescribed by the Regional Administrator.

The permittee shall not recommence injection until all corrective action has been taken in accordance with a compliance schedule prescribed by the Regional Administrator and approval has been subsequently received from the Regional Administrator.

G. WELL OPERATION AND MONITORING REQUIREMENTS

12. Mechanical Integrity.

(a) INITIAL DEMONSTRATION. A mechanical integrity test must be performed and the integrity of the well must be demonstrated to the satisfaction of the Regional Administrator prior to commencing injection. In addition, the permittee must submit a copy of the cement bond log and an interpretive analysis of same for this well within three months of the effective date of the permit.

(b) SUBSEQUENT DEMONSTRATIONS. A demonstration of mechanical integrity in accordance with 40 CFR 146.8 shall be made every five years from the effective date of this permit. The permittee shall notify the Regional Administrator of his intent to demonstrate mechanical integrity at least 30 days prior to such scheduled demonstration. Results of the test shall be submitted to the Regional Administrator as soon as possible but no later than 60 days after the demonstration. The permittee may continue operations only if the well has demonstrated mechanical integrity, otherwise injection activities shall be halted.

(c) Mechanical integrity tests shall be performed using noncorrosive fluids consisting of either ordinary tap water or corrosion inhibited formation fluid from the production zone.

Where is this now

More to Section

101 w/conditions with which conditions, all?

Compliance with permit conditions 9(d).

Section A Summary Denial 144.1

Where is this for why he correct the problem of a comp school?

How does this section interface w/ the 3 month compliance schedule

What ABOUT 144.51 (p) - to comply w/ RA's schedule.

Where is this from. If no specific REG APPROVAL is stated in basis.

to avoid questions of fact
Injection operations prohibited until the permittee receives written demonstration of satisfaction. He problem of a comp school?

Received notice from RA.

13. Injection Interval.

- (a) Injection shall be limited to the Mission Canyon Formation in the subsurface interval between 6286 ft. and 6394 ft.
- (b) Injection between the outermost casing protecting underground sources of drinking water and the well bore is prohibited.

14. Injection Pressure Limitation.

- (a) Injection pressure, measured at the surface, shall not exceed 900 pounds per square inch (psi).
- (b) ~~Injection at a pressure which initiates fractures in the confining zone or causes the movement of injection or formation fluids into an underground source of drinking water is prohibited.~~ *any*

15. Injection Volume Limitation. The volume of produced brine wastes to be injected into the well will be limited to 3000 barrels per day.

15. Monitoring Requirements.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The permittee shall identify the types of tests and methods used to generate the monitoring data.

(b) Injection fluid analysis - The nature of injection fluids shall be monitored:

(1) initially for Total Dissolved Solids, major ions and Ph.

Any chemicals added to the produced fluids shall be tested
(2) whenever there is a change in the source of injection fluids. A comprehensive water analysis equivalent to that submitted with the permit application shall be submitted to the Regional Administrator within 30 days of any change in injection fluids.

(c) Injection pressure, flow rate and cumulative volume - Injection pressure, flow rate and cumulative volume shall be observed weekly. At least one observation of injection pressure, flow rate, and cumulative volume, shall be recorded at regular intervals no greater than 30 days apart.

H. PLUGGING AND ABANDONMENT

17. Notice of Plugging and Abandonment. The permittee shall notify the Regional Administrator 45 days before conversion or abandonment of the well.

18. Plugging and Abandonment Plan. The permittee shall plug and abandon the well as provided in the plugging and abandonment plan. See Attachment A. Permittee will abandon the well in a state of static equilibrium with mud